

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**DEUTSCHE BANK NATIONAL  
TRUST COMPANY, AS TRUSTEE  
FOR MORGAN STANLEY ABS  
CAPITAL I INC. TRUST 2004-HE7  
MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2004-HE7,**

**Plaintiff,**

**V.**

**SOLOMON VALLEJO, VERONICA VALLEJO; and MILA, INC. D/B/A MORTGAGE INVESTMENT LENDING ASSOCIATES, INC.,**

## Defendants.



**Civil Action No. 7:20-cv-335**

**PLAINTIFF'S MOTION TO EXTEND ORDER ABATING CASE**

Plaintiff Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2004-HE7 Mortgage Pass-Through Certificates, Series 2004-HE7 (“Deutsche Bank” or “Plaintiff”), files this its *Motion to Extend Stay Order Abating Case* and respectfully shows as follows:

1. Plaintiff filed its *Original Complaint* on October 21, 2020 (the “Complaint”) against Defendants Solomon Vallejo, Veronica Vallejo and Mila, Inc., d/b/a Mortgage Investment Lending Associates, Inc. (“Defendants”). (ECF Document No. 1). Plaintiff completed service on Defendants Solomon Vallejo and Veronica Vallejo on November 10, 2020.

2. On December 4, 2020, Plaintiff filed its *Motion to Abate Case* in which Plaintiff represented that it was prohibited from moving forward with judgment in this action under current CFPB regulations because the loan was undergoing active loss mitigation and that

foreclosure of the property subject to the suit was placed on hold as of December 3, 2020. (ECF Document No. 14).

3. The Court ordered the case to be abated for 90 days until March 8, 2021. (ECF Document No. 15). However, the subject loan is still undergoing active loss mitigation. Accordingly, Plaintiff respectfully requests that this matter be abated for an additional period of sixty (60) days to allow the Parties to continue and conclude the loss mitigation procedures.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this Court extend the stay and all upcoming deadlines for sixty (60) days and for such other relief to which it may be justly entitled.

Respectfully submitted,

By: /s/ Vivian N. Lopez  
**MARK D. CRONENWETT**  
Texas Bar No. 00787303  
[mcronenwett@mwzmlaw.com](mailto:mcronenwett@mwzmlaw.com)

**VIVIAN N. LOPEZ**  
Texas Bar No. 20818-PR  
[vlopez@mwzmlaw.com](mailto:vlopez@mwzmlaw.com)

**MACKIE WOLF ZIENTZ & MANN, P.C.**  
14160 N. Dallas Parkway, Suite 900  
Dallas, Texas 75254  
Phone: (214) 635-2650  
Facsimile: (214) 635-2686

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 1, 2021, a true and correct copy of the foregoing document was delivered to the following parties in the manner described below:

**Via U.S. Mail**

Veronica Vallejo  
2502 East 29<sup>th</sup> Street  
Mission, TX 78574

**Via U.S. Mail**

Solomon Vallejo  
2502 East 29<sup>th</sup> Street  
Mission, TX 78574

/s/ Vivian N. Lopez  
**VIVIAN N. LOPEZ**